

cc

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

2008 JAN 18 AM 10:03

FILED

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 01 44

UNITED STATES OF AMERICA,

Plaintiff,

v.

Manuel Alejandro VERDUGO-Sandoval

Defendant,

Magistrate Case No. 08 MJ 01 44 DEPUTY

COMPLAINT FOR VIOLATION OF

Title 8, U.S.C., Section  
1324(a)(2)(B)(iii)-  
Bringing in Illegal Alien(s)  
Without Presentation

The undersigned complainant being duly sworn states:


On or about **January 16, 2008**, within the Southern District of California, defendant **Manuel Alejandro VERDUGO-Sandoval**, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, **Miguel Artemio MORALES-Marquez**, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien, and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

  
SIGNATURE OF COMPLAINANT

Sara Esparagoza, U.S. Customs and Border  
Protection Enforcement Officer

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **18th** DAY OF  
**January, 2008**.

  
UNITED STATES MAGISTRATE JUDGE

**PROBABLE CAUSE STATEMENT**

The complainant states that **Miguel Artemio MORALES-Marquez**, is a citizen of a country other than the United States; that said alien has admitted he is deportable; that his testimony is material; that it is impracticable to secure his attendance at trial by subpoena; and that he is a material witness in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On January 16, 2008 at approximately 2110 hours **Manuel Alejandro AVERDUGO-Sandoval (Defendant)** made application for admission into the United States at the San Ysidro, California Port of Entry as the driver and sole visible occupant of 2000 black Volkswagen Jetta. The Defendant stated to a Customs and Border Protection (CBP) Officer that he was going to San Diego and claimed ownership to the vehicle. The CBP Officer performed an inspection of the vehicle and discovered several undocumented aliens within the trunk. Defendant was escorted to the Security Office and the vehicle was taken into vehicle secondary for further inspection.

In secondary, a CBP Officer inspected the vehicle more thoroughly and discovered two undocumented aliens in the trunk of the vehicle. Further investigation revealed the two individuals to be citizens and natives of Mexico with no entitlements to enter the United States. One individual is now identified as **Miguel Artemio MORALES-Marquez (Material Witness)**.

During a videotaped interview, Material Witness declared he was a citizen of Mexico who has no legal rights to enter the United States. Material Witness stated he was en route to Los Angeles, California to reside and seek employment. Material Witness stated he made the smuggling arrangements with two unknown smugglers in Tijuana Baja California, Mexico. Material Witness stated he paid \$3000.00 Pesos (Mexican Currency) before being placed in the trunk of the car. Material Witness stated he was placed in the trunk by the two Hispanic males. Material Witness stated once in the trunk he did not see who was driving the vehicle across the border.